

1 THE HONORABLE FRANKLIN D. BURGESS  
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8 IN THE UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON AT TACOMA

10 JAMES DANNENBAUM, JOSE H. )  
11 MELENDEZ and all other similarly situated )  
12 employees of Defendants, ) Case No.: C04-5199 FDB  
13 )  
14 Plaintiffs, ) STIPULATED MOTION FOR  
15 ) EXTENSION OF CERTAIN CASE  
16 ) SCHEDULE DEADLINES  
17 )  
18 vs. )  
19 )  
20 CSK AUTO, INC., an Arizona Corporation; )  
21 ROBIN SCHOFIELD and JANE DOE )  
22 SCHOFIELD, husband and wife; CHET )  
23 BRADLEY and JANE DOE BRADLEY, )  
24 husband and wife; TIM MASON and JANE )  
25 DOE MASON, husband and wife; and JOHN )  
26 DOES 1 THROUGH 10, inclusive, )  
27 )  
28 Defendants. )  
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29 Through their counsel, plaintiffs James Dannenbaum and Jose Melendez and defendants,  
30 CSK Auto, Inc., Chet Bradley, Robin Schofield, and Tim Mason and their spouses (collectively,  
31 "Defendants"), hereby stipulate as follows:

32 1. The parties have conferred about alternative discovery and case schedule  
33 deadlines in this matter because the parties need some additional time to complete their  
34 discovery. The parties now jointly move the Court for the following extensions of discovery  
35 deadlines in the case schedule:

36 STIPULATED MOTION FOR EXTENSION OF  
37 CERTAIN CASE SCHEDULE DEADLINES - 1  
38 (C04-5199 FDB)

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<u>Deadline</u>	<u>Date</u>
Expert Witness Disclosures	6/3/05
Rebuttal Expert Disclosures	7/1/05
Discovery Cutoff (except expert depositions)	7/15/05
Deadline for Mediation (Settlement Report)	7/22/05
Objections to Opposition's Expert Witnesses	7/29/05
Deadline for Filing Motions (except Motions in Limine)	8/4/05

2. Given the time lines above, the parties agree that they should be permitted to take expert depositions at mutually agreeable times following the discovery cutoff. The parties agree that neither the above deadline extensions nor the post-cutoff expert depositions will have any impact on any of the later deadlines in the case schedule, including the trial date and the deadlines for filing trial-related pleadings.

3. Based on the above, the parties respectfully request that the Court enter the accompanying [Proposed] Order Extending Case Schedule Deadlines.

DATED this 18<sup>th</sup> day of April, 2005.

LAW OFFICE OF GRANT & ASSOCIATES JACKSON LEWIS LLP

By: K Bell for - per telephone confirmation By: K Bell  
 Artis C. Grant, Jr. WSBA #26204  
 Roxanne Rarangol, WSBA #30340  
 Attorneys for Plaintiff

Karen P. Kruse, WSBA #19857  
 Kristin Bell, WSBA #32766  
 Attorneys for Defendants

## **DECLARATION OF SERVICE**

The undersigned declares under penalty of perjury under the laws of the United States of America that a true and accurate copy of the document to which this declaration is affixed was sent via US mail and facsimile, on this 18 day of April, 2005, to:

Artis C. Grant, Jr. WSBA #26204  
Roxanne Rarangol, WSBA #30340  
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Tacoma, WA 98409  
253.473.9695

Dated this 18 day of April, 2005, at Seattle, Washington.

Andrea W. Preston